



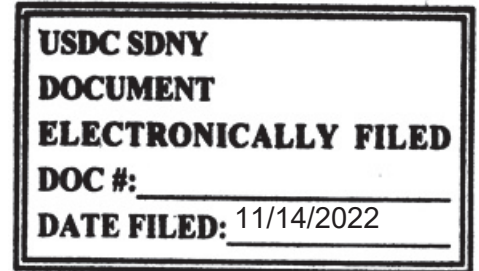
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November 11, 2022

**Via ECF:**

The Honorable Robert W. Lehrburger, U.S.M.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St.  
New York, NY 10007-1312



Re: **Ramirez, et al v. Urion Construction LLC, et al**

Civil Docket No.: 22-cv-03342 (LGS) (RWL)

Dear Judge Lehrburger:

We represent Plaintiffs in this FLSA matter, and we respectfully submit this letter motion to respectfully request an extension of time for the Plaintiffs to submit their inquest materials necessary for The Court to issue its report and recommendation.

By Order dated September 23, 2022 (*see* Dkt. 30), the Court had directed the Plaintiffs to file all inquest materials necessary for The Court to issue its report and recommendation, by October 24, 2022; which the Court then graciously extended until November 14, 2022. Dkt. 34.

The Court also directed that "Plaintiffs must also submit affidavits/declarations from each Plaintiff attesting to the damages-related facts (years/weeks worked, hours worked, pay received) that underlie the calculations in Exhibit I to the affirmation of attorney Scher at Dkt. 22." Dkt. 34.

The reason the instant request is being made, is that we are currently still in the process of procuring and drafting the Plaintiffs' necessary supporting evidentiary materials, and will require additional time to complete this process, in compliance with the Court's Orders; Plaintiffs anticipate three (3) weeks' time to be sufficient to do so.

Therefore, Plaintiffs respectfully request until Friday, December 2, 2022, for the Plaintiffs to submit the inquest materials pursuant to the Court's Order. We thank the Court for its kind consideration on this matter, we remain available to provide any additional information necessary.

Extension granted. Plaintiffs' inquest submission shall be filed by December 14, 2022. Defendants' response, if any, shall be filed by January 6, 2023. Within three days of entry of this order, Plaintiff shall serve a copy of this order on Defendants by means previously approved and shall file an affidavit of service of same. Within three days after service of the order, Plaintiffs shall file proof of service of same.

Respectfully submitted,

*Avraham Y. Scher*

Avraham Y. Scher, Esq.  
Helen F. Dalton & Associates, P.C.  
*Attorneys for Plaintiffs*

SO ORDERED:

11/14/2022

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE